



Federal Communications Commission
Washington, D.C. 20554

February 25, 2012

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Measuring Broadband America Program, GN Docket No. 12-264

Dear Ms. Dortch:

On February 1, 2013, Nick Feamster, Associate Professor Georgia Tech, David Levin, Research Scientist University of Maryland, Arvind Narayanan, Assistant Professor Princeton University, and Scott Coull, Redjack, met with James Miller, Senior Attorney Advisor Federal Communications Commission to discuss the Commission's Measuring Broadband America program's mobile measurement effort. The meeting focused on discussion of technical aspects of proposed privacy policies for the collection and processing of the program's broadband performance data and discussion of a review a technical document for privacy policy analysis, sample data and data schemas.¹

Participants discussed the fields in the data schema and a need review the fields in more detail. Mr. Miller described the Android operating systems resources used to reference the fields of data and agreed to provide a document with more explicit descriptions that might be used in a technical reference for the program. Participants discussed a field labeled "last_known_location" as an example of a possible reference between individual measurement observations that could be relevant for an analysis of the dataset for reidentification risk and how the entropy of the dataset might be affected. Mr. Miller discussed that he would contact the application developers and confirm what cross-measurement references exist, if any.

Mr. Miller sought further feedback on what re-identification techniques and third-party databases might be used with handset radio performance, or other data elements in the proposed scheme to de-anonymize mobile performance data. Participants discussed that based on available knowledge there were no obvious realistic threat models that would be posed by the data schema proposed.

Participants discussed logistical details of how data may be made available for reidentification analysis. Mr. Miller explained that a non-disclosure agreement (NDA) would define the relevant restrictions and obligations agreed to in the privacy review process. Participants discussed how research assistants could also be incorporated in the process and whether separate NDA would be required. Mr. Miller also related past discussions that no publishing focused on the substance of the broadband performance data would be permitted under the reidentification review but that discussions of the techniques and processes employed to analyze the broadband performance data would be permissible for purposes of improving the state of the art of technical privacy policy development.

¹ The review documents and ex parte filing of the meeting are available in GN Docket No. 12-264.

Mr. Miller invited the participants to share further comments and feedback at the mobile collaborative meeting scheduled for February 6, 2013.

Sincerely,



James Miller, Senior Attorney Advisor
Electromagnetic Compatibility Division/OET